

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LG.PHILIPS LCD CO., LTD.,

Plaintiff/Counterclaim Defendant,

v.

TATUNG COMPANY;
TATUNG COMPANY OF AMERICA, INC.;
CHUNGHWA PICTURE TUBES, LTD.;
AND VIEWSONIC CORPORATION,

Defendants/Counterclaim Plaintiffs.

Civil Action No. 05-292 (JJF)

**LOCAL RULE 7.1.1 STATEMENT IN SUPPORT OF
PLAINTIFF'S MOTION FOR PROTECTIVE ORDER
REGARDING DEFENDANTS' FIRST SET OF REQUESTS FOR ADMISSION**

The undersigned attorney for plaintiff, LG.Philips LCD Co., Ltd. ("LPL") hereby states, pursuant to Local Rule 7.1.1, that LPL's attorneys have made a reasonable efforts to reach agreement with opposing counsel on the matters set forth in LPL's Motion for Protective Order Regarding Defendants' First Set of Requests for Admission, but that no agreement was forthcoming.

July 3, 2006

THE BAYARD FIRM

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